



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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August 8, 2005

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P.O. Box 1715
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Subject: Draft General Reevaluation Report/ Supplemental Environmental Impact Statement for Poplar Island Restoration Project. CEQ # 20050253

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the Draft General Reevaluation Report/ Supplemental Environmental Impact Statement for Poplar Island Restoration Project. The proposed project is to expand the existing Poplar Island Dredged Material Placement Site by 575 acres consisting of approximately 60 percent wetlands and 40 percent upland. Also included is the raising of the existing upland Cells by 5 vertical feet.

EPA region 3 has been part of Poplar Island and the Draft Dredged Material Management Plan (DMMP) interagency team reviewing all alternatives to long term disposal needs for the Federal Navigation Channels for the Ports of Baltimore and concur that expansion of the Poplar Island facility is needed. Based upon our review of the Draft SEIS the project is rated as LO-1, Lack of Objections (LO), and the Adequacy of the document (1). A copy of the EPA rating criteria is enclosed for your reference. However, we do have the following comments and concerns on the Project.

- Maximizing the wetlands to uplands ratio is very important. The 60/40 ratio is more consistent with EPA's 404b1 guidelines. However, it should be noted that there is still an overall loss of aquatic habitat from the expansion of the Poplar Island Facility. We therefore recommend that during construction of the wetlands, all the resource agencies work closely with the Corps to assure the highest quality wetlands possible.
- In reviewing the documents it was evident that the upland dykes can be raised higher than 5 feet, engineering suggests up to 15 feet. While the public comments suggests minimizing any vertical limits, raising the uplands dykes 10 feet would provide 1-3 additional years capacity and limit the need for further aquatic loss. While it was stated that beyond 5 foot rise would not have an environmental benefit, prevention of loss of further aquatic habitat is also an environmental benefit.

- EPA strongly favors the incorporation of an open water embayment within the expansion footprint in the northern end currently to be used as the staging area. The National Marine Fisheries Service has proposed several designs and long term protection of the benthic communities in this area would provide fisheries habitat which would significantly increase the value of the adjacent wetlands.
- Concurrently to the construction of the expansion, EPA urges the development of a long term management effort to protect and improve wetlands in the Black Water Wildlife (BWR) Refuge in Dorchester County. The BWR needs millions of cubic yards of materials and while this alternative will require some major engineering and design, this site is of national aquatic significance and has the potential for large scale wetlands creation.
- In adding any new channels for disposal at Poplar Island Expansion, must follow the testing requirements in the COE/EPA's Upland Testing Manual.

If you have any questions or comments regarding our letter please feel free to contact me at 215-814-3367 or Mr. Peter Stokely at 703-648-4292.

Sincerely,



William Arguto, NEPA Team Leader
Environmental Programs Branch

Enclosures: